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May 5, 2020

VIA ECF

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *John Purcell v. New York Institute of Technology-College of Osteopathic
Medicine*, 16-CV-3555 (JMA)(AKT)

Dear Judge Tomlinson:

This firm represents Defendant New York Institute of Technology (“NYIT”), improperly named herein as New York Institute of Technology – College of Osteopathic Medicine, in the above-referenced action. NYIT respectfully requests a two-week extension of time from May 8, 2020 until May 22, 2020 to respond to Plaintiff’s discovery requests. As mentioned during the March 24, 2020 status conference, NYIT engaged a vendor to assist with electronic discovery to review thousands of pages of potentially responsive e-mails. We require additional time to complete our review of these documents in order to finalize NYIT’s responses to Plaintiff’s discovery requests.

Should the Court grant NYIT’s request for a two-week extension of the discovery deadline, we respectfully request an adjournment of the May 13, 2020 status conference until a date after the new discovery deadline. We conferred with Plaintiff’s counsel who consents to NYIT’s second request for an extension of this discovery deadline and first request for an adjournment of the status conference.

Thank you for Your Honor’s consideration of NYIT’s requests.

Respectfully Submitted,

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Attorneys for NYIT

By:



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cc: Stewart L. Karlin, Esq.